

Exhibit 43

Excerpts of deposition of TST 30(b)(6) (Gregory Stevens)
(November 3, 2023)

In the Matter Of:
THE SATANIC TEMPLE V. NEWSWEEK DIGITAL

1:22-cv-01343-MKV

GREGORY STEVENS

November 03, 2023

30B6



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THE SATANIC TEMPLE V. NEWSWEEK DIGITAL

November 03, 2023

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1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK

4 THE SATANIC TEMPLE, INC.,

5 Plaintiff,

6 -against-

Case No.

1:22-cv-01343-MKV

7 NEWSWEEK DIGITAL, LLC,

8 Defendant.

9 -----x

10 November 3, 2023
11 9:43 a.m.

12
13 30(b)(6) Deposition of Plaintiff by
14 GREGORY STEVENS, taken by Defendant, held at
15 30 Rockefeller Plaza, New York, New York,
16 before Joseph R. Danyo, a Shorthand Reporter
17 and Notary Public within and for the State
18 of New York.
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A P P E A R A N C E S :

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By: CAMERON STRACHER, ESQ.
SARA TESORIERO, ESQ. (Via Zoom)

Also Present:

LAURA HENRIQUE, ESQ., Newsweek (Via Zoom)

RACHELLE PIKE, Paralegal, Cameron Stracher PLLC
(Via Zoom)

~oOo~

1 Stevens

2 to work on projects full time for The Satanic
3 Temple, and that was when I started working on
4 the ordination program, which we ended up
5 launching a couple of years later and other
6 miscellaneous projects as well.

7 So then now and ever since 2020 I
8 will say we launched an ordination program, and
9 my role has been the director of ministry and
10 having been central to the creation of the
11 ordination program and sort of launching that,
12 ramping that up and also being the head of the
13 team now that manages the ordination council that
14 manages the ordination of new ministers as well
15 as management, and so, although we officially,
16 our group doesn't decide upon complaints, we have
17 a separate group for that in the organization.
18 It is no longer the national council. There was
19 a restructuring.

20 So there's an actual group that is
21 dedicated called the Suryan Council that is
22 dedicated to hearing complaints about the
23 violation of code of conduct, which the matters
24 on Schedule A would fall under violations of code
25 of conduct, and there is another group, the

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concerns committee, that hears, receives complaints about investigates and adjudicates matters that are not violations of the code of conduct, but still, you know, things when people have a concern about something, whether it's someone in a position with responsibility not doing their job, stuff that is not a violation of code of conduct, but other complaints, so this is all a product of the rapid growth.

There was a point in about 2020 when, 2021, when having a single body, the national council, to do all the things we realized wasn't going to work anymore. So we started a restructuring, and that's when we got the Suryan Council, and then the national council was finally dissolved and replaced with a governing system for the congregations that's basically a collection of committees instead of having a single thing.

Again, this is all in the service of dealing with the rapid growth, and in that committee is the administrative committee, legislative committee and then the concerns committee. That's the other one, so now the

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ordination council which I as the director of ministry and the head of we are tasked with investigating complaints. Two groups that are tasked with investigating complaints are the Suryan Council and the concerns committee, but, if they get reported a complaint and do an investigation, anything that concerns a minister, because that is sort of our, you know, bailiwick as it were, they will let us know like, hey, we have done this investigation, here is the sort of top-level report, and, regardless of their determination of whether some other remedy, you know, is appropriate for the congregations or the administrative side of it they are like here are the facts.

So then our council can decide do we think some sort of remedy on the ministerial side of it, because it's possible someone, maybe what they did was not rising to the level of them being removed from leadership position, but maybe we don't want them to be a minister anymore. These are separate determinations. So they would pass the information to us.

So it, as a consequence between me

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congregation and let's say it doesn't involve the minister, but it involves another member in that congregation? How would that get handled and reported?

A. Regardless of whether it does or doesn't involve any of these things, that's handled by the Suryan Council, and so the Suryan Council has a form that we put a lot of effort into making sure all of our members are aware of and realize like, hey, anyone, you don't need to be in leadership. You can use this form. You don't even need to be an official member of a congregation. If you had an interaction with someone, like anyone can use this form.

We also make a point of if internally if someone reports something to the concerns committee, but like, you know, some of them don't necessarily know, but or they feel like they just remember the concerns committee, they don't remember the other one, if the concerns committee receives a report of something like sexual assault, immediately they refer it over to the Suryan Council.

If someone feels very comfortable

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2 with me as the director of the ordination
3 council, then so they also like the Suryan
4 Council, so we make sure that all of that gets
5 submitted to them, because they're the team that
6 receives those complaints and investigates and
7 responds.

8 Q. Who is the head of the Suryan Council
9 at present?

10 A. So I don't know if he is officially
11 the head. I know the most senior member of the
12 Suryan Council his name is Steven, I'm not sure
13 how to pronounce his last name. L-e-n possibly
14 c-z-e-r. I want to verify that. Yeah. He's the
15 most senior person when I'm having communication
16 with the Suryan Council is most often the person
17 I'm speaking to.

18 Q. How long has he had that position, if
19 you know?

20 A. Several years. I don't know exactly.

21 Q. What happens when a complaint of a
22 sexual nature comes into the Suryan Council? How
23 is it handled?

24 A. So I'm not part of the Suryan
25 Council, so I can't speak firsthand, but I can

1 Stevens

2 tell you what I know their policy is. Fair?

3 Q. Yes.

4 A. Their stated policy is that as a
5 first step they gather from the person who
6 submitted the complaint gather any clarifying
7 information. They will first talk to them and
8 make sure they have all the information.

9 If it is sexual assault, they will
10 ask if the person, they will encourage the person
11 to go to the police and file a police report.
12 You know, we try not to pressure people because
13 we understand how people feel and how a lot of
14 people don't want to be sort of re-traumatized,
15 but we would rather in someone like that police
16 have a much much better capacity for
17 investigating things, since it's a crime that
18 should be reported.

19 Q. Let me interrupt you and I apologize.
20 Let's agree that it's a complaint of a sexual
21 nature that is not a crime that would need to be
22 reported to the police. More a sexual
23 harassment, inappropriate sexual conduct,
24 something that a member feels was improper.

25 A. So just to make sure I understand,

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right now we're not talking about sexual assault?

Q. Correct.

A. Like I was saying, first, the person who submitted a report, talk to them, and if there are other people involved, I believe that the order is usually to get corroborating evidence from other people mentioned, and then the last person that will be interviewed will be the person that the allegation is against, just to sort of get all the ducks in a row ahead of time, and sometimes honestly if there's documented evidence in the form of, you know, screenshots for online harassment and stuff like that, I think there are times when they don't even necessarily need to go that far. I think they almost always will just to see if they can get the person who was accused to admit what they're going to say about it, they will get to that point, but some of these steps can be shortcut if there is very, very clear evidence, and then there will be the deliberation about what should be done.

Most of the time if it's something like what you're describing, what I understand

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you to be describing, that is serious enough that we are skipping right past the warning, please don't do it again, and it is removal from a position of power, and by the way, often the way that things actually unfold is that, if there is a problem in a congregation, so congregations have the power to remove someone from the congregation.

Often what happens in a case that is severe enough that it would be considered something like I think sexual harassment, for the safety and for the safety of the members of the congregation, the congregation will remove them or kick them out of the congregation and still report it to the Suryan Council in case there are other things that need to be done, but will kick them out from the very beginning.

That's another thing that I forgot to mention. Usually the ordination council we don't like, we try to be very cautious and evidence-based, so we don't like acting on accusations, but, if we get a report, a notification from Suryan Council and we have. This happened several times where an accusation

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2 of something has been severe enough, something
3 like sexual harassment, that even though they
4 haven't finished their investigation, it is
5 severe enough that they think something like an
6 administrative suspension would be recommended.
7 They will recommend it to us, and we do that.

8 So we will take away someone's access
9 as a minister for while the investigation is
10 taking place if we think that the -- if the
11 Suryan Council recommends it and usually
12 recommended if there is evidence that this person
13 constitutes a potential risk, right. So that,
14 sorry, that was a little wandering answer. I
15 hope I gave you what you wanted there.

16 Q. No, no, no. That's very helpful.
17 Thank you. So we have a bunch of documents that
18 were produced by your counsel, and we understand
19 that these documents represent all the
20 documentation that The Satanic Temple has
21 regarding and relating to claims of sexual abuse.
22 Is that your understanding as well?

23 A. I believe so. Yeah.

24 Q. As far as you know, there are no
25 other documents other than the ones that have

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knowledge, that indicates that this falls within that scope, and if you ask me if I know for absolute certain, I'm not familiar with the incident, but I also believe that it's outside the scope, because there's nothing at all to indicate that this had sexual assault as a component.

Q. Got it, but you understand that this was produced in response to our request for all documents reflecting allegations of sexual abuse? Put it this way. I will represent to you that this was produced in response to our request for all documents reflecting allegations of sexual abuse.

A. Okay.

Q. But your testimony is you don't know whether this is in fact relating to an allegation of sexual abuse?

A. I mean, no, I don't know for certain one way or the other, like I said, but in my review in preparation for this, although I have seen this e-mail thread before, I did not consider it to be within the scope, because it does not have the appearance of anything that

1 Stevens

2 involves sexual abuse.

3 Even the language in the announcement
4 that you called attention to on page 3 that Amber
5 Saurus wrote along with Sadie, you know, The
6 Satanic Temple cannot tolerate acts of violence
7 or abuse at its religious functions.

8 Q. Okay.

9 A. Yeah.

10 Q. When did you see this document?

11 A. It was when I was initially working
12 on trying to help with discovery for this, and I
13 worked with like, as I mentioned before, I was on
14 the groups that review these things for a period
15 of time, but to help cover the gaps a friend of
16 mine who was on during the periods when I wasn't
17 I was working with her, and we were looking
18 through all the e-mails, and the topic actually
19 literally came up like with these e-mails if you
20 just search for certain keywords you're just
21 going to get way more than is actually relevant.
22 So sometimes we were not sure.

23 So the strategy by me that I was
24 like, well, let's give our lawyer everything and
25 leave it at that, but this was not produced, this

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2 at least according to this very last e-mail, but
3 whether that was done, whether she stepped away,
4 what happened subsequently we don't know.

5 MR. KEZHAYA: Objection. Calls for
6 speculation.

7 Q. Well, do you know?

8 A. I only know -- everything I know
9 about this incident I know from this e-mail
10 thread. So, yeah. I'm not sure.

11 Q. Okay. By the way, when a decision is
12 made as a result of the adjudication of a
13 complaint, how is it documented?

14 A. It has changed over time. I'm trying
15 to think back to 2019. If you're asking about --
16 because I think that it took some time.
17 Currently and from about 2020 on it became much
18 more formal, especially with the formation of the
19 Suryan Council like there's an actual like this
20 is a report of the outcome of the investigation.
21 Make sure that not only is this person e-mailed,
22 but it's cc'd. You know, there was a lot more
23 formality from 2020 on.

24 At this time and earlier, so this is
25 2019, 2019 and earlier, I think that there was a

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lot more that was done just via e-mails or via communications telling people to step down or asking people to step down and so on as opposed to like official like statements or whatever.

Q. Got it.

A. Again, for this particular one I don't know, but that's my answer to you generally.

Q. Is it fair to say, asking you in your official capacity that, if there had been a document reflecting an adjudication, it would have been produced to us?

A. Oh, yeah. Yeah. Absolutely.

Q. Let's mark this as Exhibit 5.

(Defendant's Exhibit 5, Document Bates stamped TST 86.0001 and 86.0002, was so marked for identification, as of this date.)

Q. Are you familiar with Exhibit 5?

A. I am.

Q. Alright. What is it?

A. It's an e-mail thread that's about the topic that, if I may, incidentally ties to the first of the listed items on my document,

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the past and in other situations retaliation

comes just spreading gossip on social media.

Yeah. Like that happens, and it hurts people to have someone go all out blasting them on social media, and that's some of the biggest fear that people have.

So that's what I speculate, but it is speculation. Based on the text, I don't know.

Q. So, to summarize then, no action was taken because he voluntarily stepped down. Is that right?

A. No. He was pressured to step down. He was talked into stepping down so that no action would need to be taken. I think that there is a material difference between those two phrasings.

Q. How do you reach that conclusion?

A. How do I reach that conclusion?

Q. That he was convinced to step down or pressured to step down.

A. Apart from the fact that Kym directly says, Kym actually says that that would be the method or okay. Hang on. The way I understand Kym's assertion in that paragraph when he says,

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step down?

A. He didn't say the person is going to step down. He said that, if we took action, it would be in everyone's best interest. This is the argument that he would make to Fred to try to convince him to. I don't think this is -- in my mind, this isn't that difficult to understand. Imagine yourself in a room where the person and you feel like you already know and are sure like, yeah, this person has done crappy stuff. I have seen it.

In your mind, you are thinking I'm -- like this person is going to be kicked out because I know what has happened, but you can't promise that. You're behaving properly. There has to be an investigation first. So what you do you say, alright, if we take action, then we're going to do everything we can to minimize the chance of retaliation.

One way is to try to, instead of bringing down the hammer on him, you know, get him to, convince him that it's in his own best interest to, you know, do as Nixon did, you know what I'm saying?

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Q. Bow out gracefully.

A. Yeah, so this was, all I was saying is to me the motivation and sort of sequence, the connections here don't seem at all ambiguous. It seems very clear what is going on here is there is a person who feels personally confident that like, yeah, this person did a crappy thing. He's going to be out of here. I cannot professionally definitively promise that, right? So what I say instead is, hey, we're going to look into it, and if wink, wink, if we do something, we're going to do it in a way to try to make him less motivated to retaliate.

Q. Okay, but there is no documentation that there was any investigation, correct?

A. I think the only thing that I can think of that would be if there were, yeah, no, as far as I know. No.

(Lunch recess: 12:30 p.m.)

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Afternoon Session

1:08 p.m.

G R E G O R Y S T E V E N S, having been
previously duly sworn, was examined and testified
further as follows:

MR. STRACHER: Let's mark as
Defendant's 12.

(Defendant's Exhibit 12, Document
Bates stamped TST 119, was so marked for
identification, as of this date.)

EXAMINATION (Continued)

BY MR. STRACHER:

Q. Take a look at Exhibit 12 and let me
know if you recognize it. While we are at it,
let's mark as Exhibit 13 a document that is TST
120.

(Defendant's Exhibit 13, Document
Bates stamped TST 120, was so marked for
identification, as of this date.)

MR. STRACHER: I'm marking these all
because they relate to the same complaint.

THE WITNESS: Okay.

MR. STRACHER: Exhibit 14.

(Defendant's Exhibit 14, Document

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harm, general damages for reputational harm and punitive damages."

So let me ask you about the special damages. Lost donations, lost membership, future economic losses. How do you measure those? How many lost donations have you suffered?

A. So I can't give you numbers. I didn't come here. Like I know whatever process was involved in generating the numbers that were presented for the court are the result of research and the calculation. I can't give you details. I didn't do that calculation. What I can say is that we have seen over a period of time since the Newsweek article came out there are people who are not hesitant about messaging us and saying that they're canceling their recurring donation because of this, that or the other, right, so that kind of thing can be tied very, very specifically and also whenever there are people who are actively, whether trying to denigrate TST, now they have this thing that looks very official in their handbook of like, oh, we must be right because look at this thing that was published, which is incredibly harmful,

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all the time, and so an accusation of not just some individual person doing bad things, but an institutional whatever, you know, coverup is incredibly harmful to us, because it undermines our entire, you know, religious beliefs.

Q. Is the threat of that harm a useful weapon against TST?

A. Yes.

Q. Directing your attention to Defendant's Exhibit 10, which pertains to TST Arizona and Wonka, have you been provided any materials today or do you otherwise know about the nature of the accusations against Wonka?

A. No.

Q. So, as you sit here today, you know nothing that could support the notion that Wonka was engaged in any form of sexual misconduct. Is that right?

A. That's correct.

Q. I would like you to expand a little bit on why does TST not proselytize as a doctrinal position and perhaps begin your answer with, if you can, a definition of proselytizing, if you think it important.

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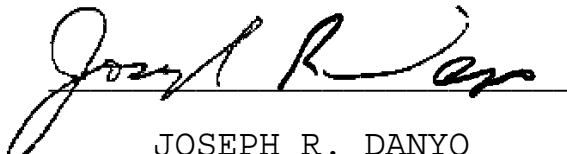
C E R T I F I C A T I O N

I, JOSEPH R. DANYO, a Shorthand Reporter
and Notary Public, within and for the State of New
York, do hereby certify:

That I reported the proceedings in the
within entitled matter, and that the within transcript
is a true record of such proceedings.

I further certify that I am not related, by
blood or marriage, to any of the parties in this
matter and that I am in no way interested in the
outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my
hand this 10th day of November, 2023.



JOSEPH R. DANYO

STATE OF NEW YORK

My Commission Expires 2/20/2027